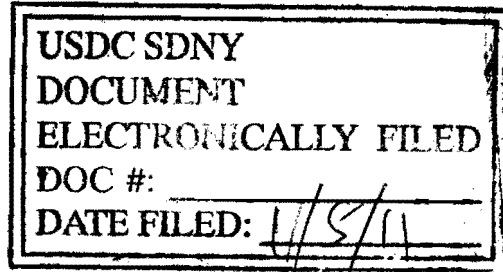


**PATTON BOGGS** LLP



January 5, 2011

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**VIA ELECTRONIC MAIL AND OVERNIGHT MAIL**

Hon. Alvin K. Hellerstein, U.S.D.J.  
United States District Court for the  
Southern District of New York  
500 Pearl Street, Rm. 1050  
New York, NY 10007

SO ORDERED.  
  
January 5, 2011

Re: *In Re: World Trade Center Disaster Site Litigation*, 21 MC 100 (AKH); *In Re: World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH); and *In Re: Combined World Trade Center Disaster and Lower Manhattan Disaster Site Litigation*, 21 MC 103 (AKH) (straddler)

Dear Judge Hellerstein:

As the Court is aware, on December 30, 2010, the Court entered an Order Accepting Report of Special Counsel and Providing for Effectiveness of Settlement. Paragraph 7 of that Order provides that any party wishing to object to any of the terms contained therein must do so by January 7, 2011. Defendants the City of New York and the Contractors<sup>1</sup> hereby seek an extension of that deadline for all aggrieved parties to January 21, 2011.

We appreciate the Court's consideration of this request. Should Your Honor have any questions or require any further information, we are available at the Court's convenience.

Respectfully submitted,

James E. Tyrrell, Jr.  
Patton Boggs LLP

cc: Paul J. Napoli, Esq. (via electronic mail)  
Andrew J. Carboy, Esq. (via electronic mail)  
Beth D. Jacob, Esq. (via electronic mail)

<sup>1</sup> AMEC Construction Management, Inc., AMEC Earth & Environmental, Inc., Bovis Lend Lease LMB, Inc., Evergreen Recycling of Corona (E.R.O.C.), Plaza Construction Corp., Tully Construction Co., Inc., Turner Construction Company, and Turner/Plaza, A Joint Venture, as well as the entities identified in Exhibit A to the World Trade Center Litigation Settlement Process Agreement, as Amended.